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FUJIAN JINHUA INTEGRATED CIRCUIT CO., LTD.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,  
Plaintiff,

v.

UNITED MICROELECTRONICS  
CORPORATION et al.,  
Defendants.

CASE NO.: 3:18-cr-00465-MMC

**JOINT STIPULATION AMENDING  
DEADLINE FOR PARTIES TO MAKE  
RULE 16 EXPERT WITNESS  
DISCLOSURES; [PROPOSED] ORDER**

Judge: The Honorable Maxine M. Chesney  
Trial Date: February 14, 2022

Defendant Fujian Jinhua Integrated Circuit Co., Ltd. (“Jinhua”) and the United States (collectively, the “Parties”), by and through their undersigned counsel, stipulate to the following and respectfully request the Court to enter an order amending the date for the Parties’ expert witness disclosures, pursuant to Rule 16 of the Federal Rules of Criminal Procedure:

WHEREAS, on April 9, 2021, the Parties stipulated that Jinhua's expert witness disclosures should be due on August 13, 2021 and the United States' rebuttal expert disclosures should be due on September 10, 2021 (Dkt. 159);

WHEREAS, on April 13, 2021, the Court entered the Parties' Proposed Order adopting the current case schedule, including the above-mentioned deadlines for Jinhua's expert disclosures and the United States' rebuttal expert disclosures (Dkt. 160 at 7);

WHEREAS, due to intervening circumstances, Jinhua has indicated that it needs additional time to complete its expert disclosures and the United States has agreed to Jinhua's requested extension, providing that Jinhua agrees to a short extension of the government's rebuttal expert deadline;

WHEREAS, the Parties have agreed that Jinhua's expert witness disclosures, pursuant to Rule 16(b)(1)(C), should now be due on September 10, 2021, and the United States' rebuttal expert witness disclosures should now be due on October 15, 2021; and

WHEREAS, Jinhua and the United States do not believe that this brief extension of the expert disclosure deadlines will delay the pre-trial schedule or the current trial date;

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for Jinhua and the United States, that:

1. The deadline for Jinhua's expert witness disclosures, pursuant to Rule 16(b)(1)(C), should be moved to September 10, 2021; and
2. The deadline for the United States to make its rebuttal expert disclosures to Jinhua should be moved to October 15, 2021.

SO STIPULATED AND AGREED.

Dated: July 23, 2021

Respectfully Submitted,

/s/ Matthew E. Sloan  
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STEPHANIE M. HINDS  
Acting United States Attorney

In compliance with Local Civil Rule  
5-1(i)(3), I, Matthew E. Sloan, attest  
that Laura Vartain Horn has  
concurred in this filing.

/s/ Laura Vartain Horn  
LAURA VARTAIN HORN  
Assistant United States Attorneys  
NICHOLAS O. HUNTER  
STEPHEN J. MARZEN  
Trial Attorneys, National Security Division

**[PROPOSED] ORDER**

Good cause appearing, as set forth in the parties' Joint Stipulation, the Court hereby sets the following amended dates for the Parties' expert witness disclosures, pursuant to Rule 16 of the Federal Rules of Criminal Procedure:

Event	Date
Jinhua's Expert Witness Disclosure, pursuant to Rule 16(b)(1)(C)	September 10, 2021
United States' Rebuttal Expert Witness Disclosures	October 15, 2021

The remaining dates set in the Court's Pre-Trial Order (Dkt. 160) remain in effect.

**IT IS SO ORDERED.**

Dated:

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MAXINE M. CHESNEY  
United States Senior District Judge